



**Jennifer Brown**  
Senior Counsel

SBC Telecommunications Inc.  
1401 I Street NW, Suite 1100  
Washington, D.C. 20005  
Phone 202 326-8904  
Fax 202 408-8745

July 21, 2004

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Re: Ex Parte Statement**  
ET Docket No. 04-35 – New Part 4 Communications Disruptions

Dear Ms. Dortch:

On July 20, 2004, SBC Telecommunications, Inc. (SBC) representatives, James K. Smith, Suzy Henderson, James Lankford, Jennifer Brown and John Chapa, met with Jeff Goldthorp, Whitey Thayer, and John Healy of the Office of Engineering and Technology. Reiterating the positions taken by SBC in its Comments in the above referenced rulemaking, they discussed the vital need for confidential treatment of network outage information and the difficulty of utilizing ISUP messages as a metric for reporting SS7 outages. SBC also discussed its proposed blocked call metric and the problems associated with the Commission's proposed assigned number metric. Additionally, SBC emphasized its support for a three-phase reporting process to minimize the diversion of necessary resources from network restoration efforts and to enable more thorough fact-gathering for Initial Reports.

Sincerely,

/s/ Jennifer Brown  
Senior Counsel -- FCC/External Affairs  
SBC Telecommunications, Inc.

CC: J. Goldthorp  
W. Thayer  
J. Healy